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ORANGE COUNTY LOS ANGELES SAN FRANCISCO SACRAMENTO FRESNO

January 29, 2020

Ms. Iana Zadneprovskaja
Farber & Company
333 Hegenberger Road, Suite 504
Oakland, CA 94621

Re: **Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC**
WCAB No: ADJ12031731
Claim No: 040519008736
Case Status: *Open*

Dear Ms. Zadneprovskaja:

As you know applicant was scheduled for the PQME with Dr. Stroller on January 23, 2020 and enclosed herein you will find a brief letter to Dr. Stroller reminding him of the reporting requirements to issue the report within 30 days per California Code of Regulations Section 38.

Please also note that I received your third demand for Labor Code 5710 deposition fees in relation to applicant's deposition taken on October 10, 2019. I emailed Zachary Kweiler of your office on January 23, 2020 at which time I indicated that I previously recommended deposition fee payments at \$1,190.00, and although I am not sure why they have yet to be issued, I immediately contacted the client to have them issued. Should I receive confirmation from the client that the deposition fee payments were issued or will be issued I will immediately email your office.

Thank you for your attention to this matter Ms. Zadneprovskaja.

Kindest Regards,

COLANTONI, COLLINS, MARREN, PHILLIPS & TULK, LLP

BY:

JAMES J. GOINES

JJG/dr

cc: Mr. Mario Castro/Chubb Group of Insurance Companies



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ORANGE COUNTY LOS ANGELES SAN FRANCISCO SACRAMENTO FRESNO

January 29, 2020

Dr. Adam Stoller
1900 O'Farrell Street, Suite 190
San Mateo, CA 94403

Re: Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC

WCAB No: ADJ12031731
Claim No: 040519008736
Case Status: *Open*

Dear Dr. Stoller:

As you know this office represents defendants in the above-referenced matter and applicant had a PQME examination in your office on January 23, 2020.

At this time, please allow defendants to kindly remind you of California Code of Regulations Section 38 requiring that a PQME report be issued within 30 days of the examination. If you require longer than that 30 days, I strongly suspect that will not be an issue however if so, please contact the parties that way they can agree to the 30 day extension.

Thank you kindly in advance for your reporting Dr. Stoller.

Kindest Regards,

COLANTONI, COLLINS, MARREN, PHILLIPS & TULK, LLP

A handwritten signature in black ink, appearing to be "JG", written over a horizontal line.

BY:
JAMES J. GOINES

JJG/dr

cc: Ms. Iana Zadneprovskaja/Farber & Company
Mr. Mario Castro/Chubb Group of Insurance Companies